

# EXHIBIT 315

DENISE GEORGE Vol. II  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 20, 2023

1

1                   UNITED STATES DISTRICT COURT FOR THE  
2                   SOUTHERN DISTRICT OF NEW YORK  
3                   CASE NUMBER: 22-CV-10904-JSR  
4                   ACTION FOR DAMAGES

5                   GOVERNMENT OF THE UNITED STATES           )  
6                   VIRGIN ISLANDS,                           )  
7   )  
8   Plaintiff,           )  
9   )  
10   )  
11   VS.   )  
12   )  
13   )  
14   )  
15   JP MORGAN CHASE BANK, N.A.,                           )  
16   )  
17   Defendant.   )  
18   )  
19   -----  
20   )  
21   )  
22   )  
23   )  
24   )  
25   )

15   VIDEO RECORDED DEPOSITION OF

16   DENISE GEORGE

17   VOLUME II

18   THURSDAY, JULY 20, 2023

19   )  
20   )  
21   REPORTED BY:

22   DENISE D. HARPER-FORDE  
23   Certified Shorthand Reporter (CSR)  
24   Certified RealTime Reporter (CRR)  
25   Certified LiveNote Reporter (CLR)  
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   Notary Public (FLORIDA)

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1 Attorney General.

2 And in waiving that, I think  
3 he reduced it to -- I don't remember  
4 whether it was a day or something like  
5 that. I'm not sure. But he  
6 definitely waived the 21 reporting  
7 requirement.

8 (BY ATTORNEY O'LAUGHLIN):

9 Q. Do you know what the basis for  
10 that waiver was?

11 A. I can't say what the basis of  
12 it is, because you know I'm not going  
13 to go into his heads. My main thing  
14 is that you know he did that. I  
15 reviewed some documents that she --  
16 she attached. And so I don't know.

17 I can't speak for him or what  
18 was before him or -- or what went  
19 through his mind. I was only looking  
20 to that, because I had to make a  
21 decision as far as what was before me  
22 and so...

23 Q. And in preparing yourself to  
24 make that decision, did you uncover  
25 any basis for what the prior waiver

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1 grant was?

2 ATTORNEY ACKERMAN: Object to  
3 form.

4 THE WITNESS: Not really. I  
5 was just -- you know I'm not there. I  
6 don't know what his -- what the  
7 Attorney General is facing.

8 So I can only look at the  
9 files, and I can look at this record  
10 and the record in the files as far as  
11 when he entered the waiver and just  
12 read what's there.

13 But I have no way of knowing  
14 what else the Attorney General at the  
15 time was looking at or anything like  
16 that. But just based on just what I  
17 saw, I had to make an assessment of  
18 whether or not there's anything in  
19 there that would be sufficient for me  
20 to even consider whether or not he  
21 ought to get a waiver.

22 (BY ATTORNEY O'LAUGHLIN):

23 Q. The change -- the resending of  
24 the waiver under Attorney  
25 Thomas-Jacobs --

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1 think that there was justification for  
2 it. I think overall, that's what it  
3 seemed that I saw from her review of  
4 it.

5 Q. Okay. So it -- had the  
6 earlier waiver been improperly granted  
7 because there was no justification for  
8 it?

9 A. Well, I wouldn't say that. I  
10 wouldn't say that, that it was  
11 improperly -- I don't know whether it  
12 -- I have nothing to do with what any  
13 prior person did. In -- under the law  
14 it states that a waiver can be granted  
15 if it is -- if it is shown or proof is  
16 shown to the satisfaction of the  
17 Attorney General that the person, the  
18 sex offender travels internationally  
19 frequently for business or for other  
20 legitimate purpose.

21 So that's what is for the  
22 Attorney General to decide. So as far  
23 as I'm concerned, whatever happened  
24 before, that was of no concern to me.  
25 My thing is that there is a request

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1 that's before me and I'm going to have  
2 to make the decision based on what's  
3 before me, and it had to be  
4 information that's satisfactory to me.

5           But it -- it's obviously a  
6 discretionary thing. But I had to  
7 make it according to what is  
8 satisfactory to me. It really didn't  
9 matter so much to me, as far as what  
10 was satisfactory to Vincent -- to  
11 Attorney Vincent Frazer or what was  
12 satisfactory to Attorney Jacobs.

13           Once I stepped in and the  
14 request was made to me, I had to look  
15 at everything that was before me and  
16 make that decision independent of  
17 anything that happened previously.

18           Q. What did you do in response to  
19 this letter?

20           ATTORNEY ACKERMAN: Object to  
21 form.

22           THE WITNESS: Well, I did -- I  
23 did eventually send a -- an answer to  
24 her and my decision. Giving her my  
25 decision and making it clear that

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1 that purpose.

2 Q. So you didn't see any evidence  
3 that would have supported a granting a  
4 waiver under USVI law, correct?

5 ATTORNEY ACKERMAN: Object to  
6 form.

7 THE WITNESS: That would have  
8 been satisfactory to me? No. That  
9 has been satisfactory to me, I saw  
10 nothing that would have -- that would  
11 have proven to me, giving reliable  
12 proof that that's what he'd be doing  
13 in order to warrant any kind of  
14 waiver.

15 (BY ATTORNEY O'LAUGHLIN):

16 Q. So were the previous waiver  
17 grants improper under USVI law?

18 A. Previous waiver grants?

19 Q. Yes.

20 ATTORNEY ACKERMAN: Object to  
21 form.

22 THE WITNESS: I wouldn't --  
23 well, the reason why I would not say  
24 it -- I would not say it is. And the  
25 only reason why is because it's a

1       discretionary matter. Maybe it was  
2       satisfactory to -- I guess it was only  
3       Vincent Frazer that issued the waiver.  
4       But maybe -- maybe it was satisfactory  
5       to him. I don't know. I'm not in a  
6       position to know what he was  
7       considering or what was before him.

8               I just knew my whole thing is  
9       like -- irrespective of what he looked  
10      at or what was satisfactory to him or  
11      what was satisfactory to Attorney  
12      Jacobs. I had to make the decision as  
13      far as what was satisfactory to me.  
14      And I was there at that time. And in  
15      looking at that, I made it very clear  
16      that it can only be waived upon that  
17      showing.

18               I made that clear, because I  
19      wanted to make sure -- make it clear  
20      to Jeffrey Epstein that he's going to  
21      have to comply with the law and what  
22      is required in order to get a waiver.  
23      And that I will not be a part of him  
24      trying to exert any kind of you know  
25      political influence or anything like

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1 that.

2 I'm not going to be a part of  
3 that. He's going to have to look at  
4 the law. He's going to have to  
5 produce the proof as required by law  
6 that is to my satisfactory --  
7 satisfaction. And I did not see  
8 that.

9 (BY ATTORNEY O'LAUGHLIN):

10 Q. Do you think that the prior  
11 decision may have been politically  
12 influenced?

13 A. I have no --

14 ATTORNEY ACKERMAN: Object to  
15 form.

16 THE WITNESS: I have no idea.

17 (BY ATTORNEY O'LAUGHLIN):

18 Q. Is it possible?

19 A. I do not -- I have nothing to  
20 say regarding that, because I was not  
21 there and I was -- I have no idea what  
22 you know -- I don't know. I can't  
23 comment on what, you know, prior  
24 Attorney General had. That wasn't --  
25 that's not even my role to do that. I

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1                   THE WITNESS: Yeah. I don't  
2 mind speaking with you.

3                   ATTORNEY ACKERMAN: Okay. We  
4 need to go off the record because I  
5 need to know what this answer concerns  
6 before I can determine whether it's  
7 privileged or not.

8                   ATTORNEY O'LAUGHLIN: Okay.  
9 Let's go off the record.

10                  VIDEOGRAPHER: Off the record  
11 at 1:46.

12                  (Off the record)

13                  (Back on the record)

14                  VIDEOGRAPHER: On the record.  
15 The time is 2:23 P.M.

16                  (BY ATTORNEY O'LAUGHLIN):

17                  Q. Okay. Ms. George, I  
18 understand that you have had the  
19 opportunity to confer with your  
20 counsel. Correct?

21                  A. Yes. Yes.

22                  Q. And there's -- there's a  
23 communication prior to litigation that  
24 you wanted to give testimony about?

25                  A. Yes. I just wanted to

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1 complete my testimony with respect to  
2 the communications with the Governor  
3 regarding the sex offender registry  
4 issue.

5 Q. Okay.

6 A. So that letter -- the date  
7 that letter was sent, that E-mail  
8 correspondence was sent to Attorney  
9 Kellerhals and Attorney Rivers, I also  
10 sent one to Governor Bryan, a similar  
11 one.

12 But just explaining to him the  
13 -- what the laws are, and that there  
14 is a requirement that he comply with  
15 providing proof. And that my decision  
16 was until that proof was provided,  
17 that I would not be able to  
18 consider -- I would not consider, you  
19 know, any waiver.

20 I also indicated to him that  
21 -- the reasons for it and the reasons  
22 -- the reasons -- that the reason or  
23 the purpose behind the statute. And  
24 that it's there to protect the  
25 community and the importance of that.

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1                   And I did that just so that,  
2 you know, that he can have an  
3 understanding. I felt that he needed  
4 an understanding as to the importance  
5 and the magnitude of that requirement.

6                   And then he just responded,  
7 well, thank you for your -- well,  
8 I'm seeing what his response is. But  
9 he was just -- he just said, Well,  
10 thank you for your work on this. And  
11 after that, there was nothing.

12                  Q. And the response from the  
13 Governor, was that in E-mail form as  
14 well?

15                  A. Yes. That was E-mailed to  
16 me.

17                  Q. Okay. Was anyone copied on  
18 that E-mail?

19                  A. No.

20                  Q. Do you still have a copy of  
21 that E-mail?

22                  A. I might have a printed  
23 version, but -- I might.

24                  Q. Okay. Was this request that  
25 you received from the Governor, were

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1 saying, that there was -- I don't  
2 recall any conversation or anything  
3 where the Governor reached out since  
4 that, you know, last communication.  
5 And which is why I indicated there was  
6 a response to my letter to him that  
7 ended the communication. Nothing else  
8 after that pre-litigation.

9 (BY ATTORNEY O'LAUGHLIN):

10 Q. Did the position that you took  
11 in response to the Governor's request  
12 regarding Jeffrey Epstein's sex  
13 offender monitoring impact your  
14 standing with the Governor?

15 ATTORNEY ACKERMAN: Object to  
16 form.

17 THE WITNESS: At that time I  
18 don't know with respect to how he  
19 perceived it, but his response to  
20 my decision was just thank you for the  
21 work you did on it, and that's it.

22 (BY ATTORNEY O'LAUGHLIN):

23 Q. Knowing what you know now, do  
24 you think it impacted your standing?

25 ATTORNEY ACKERMAN: Objection